

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
ABINGDON**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>v.</b>	)	<b>Case No.: 1:17-CR-00027</b>
	)	
<b>JOEL A. SMITHERS</b>	)	

**MOTION FOR LIMITATIONS ON DISCLOSURE**

The United States wishes to provide grand jury materials, medical records, and other investigative materials for the investigation and prosecution of the case and to make such further disclosures as may be necessary for, and for the sole purpose of, investigating and prosecuting this case. Given the confidential nature of some of these materials, the United States requests that the Court enter an order prohibiting Stacey L. Hail, M.D., from further disclosure and unauthorized dissemination of these materials.

Accordingly, it is respectfully requested that this Honorable Court issue an order prohibiting further disclosure and unauthorized dissemination of these materials.

Respectfully submitted,

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s/ Randy Ramseyer  
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CERTIFICATE OF SERVICE

I hereby certify that on June 13, 2018, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel for defendant.

s/ Randy Ramseyer  
Assistant United States Attorney